

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

INNOVATION SCIENCES, LLC,

Plaintiff,

v.

MGM SECURITY SERVICES, INC.,

Defendant.

Case No. 1:25-cv-00837

**Jury Trial Demanded**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Innovations Sciences, LLC (hereinafter “Innovation Sciences” or “Plaintiff”) files this Complaint against Defendant MGM Security Services, Inc. d/b/a DFW Security (hereinafter “DFW” or “Defendant”) for infringement of United States Patent Nos. 10,104,425; 10,469,898; and 11,109,094 (the “Patents-in-Suit”), and alleges as follows:

**NATURE OF THE ACTION**

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*

**THE PARTIES**

2. Plaintiff Innovation Sciences is a limited liability company organized under the laws of Texas and has a principal of business at 5800 Legacy Circle, Suite 311, Plano, Texas 75024.

3. On information and belief, Defendant DFW is a corporation organized and existing under the laws of Texas with a place of business at 2533 E Loop 820 North, Fort Worth, TX 76118.

4. On information and belief, Defendant DFW has a Texas corporate filing number of 0801280623 and is domiciled in Texas.

5. On information and belief, in addition to its registered place of business, Defendant DFW may also be served with process by serving its registered agent, Marty J. Marlow at 2533 E Loop 820 North, Fort Worth, TX 76118.

6. On information and belief, DFW is a leading seller of home security products and services, including smart home panels, cameras, sensors, and other components in the United States, including doing business in the District of Texas.

7. On information and belief, DFW sells and offers to sell products and services throughout the State of Texas, including in this judicial district, as well as throughout the United States, and introduces products and services that perform infringing processes into the stream of commerce knowing that they would be used, offered for sale, or sold in this judicial district and elsewhere in the United States.

8. On information and belief, DFW has made, used, offered to sell, offered to sell access to, sold, and/or sold access to products and services, or makes, uses, offers to sell, offers to sell access to, and/or sells access to products and services, including, but not limited to, the following specifically accused products and services: (1) DFW Home Security Systems; (2) DFW Home Security System Products (*e.g.*, Security System with Cameras, Indoor/Outdoor Cameras, Doorbell Cameras, Floodlight Cameras, HD Cameras, Smoke Detectors, Motion Sensors, Door Sensors, Carbon Monoxide Detectors; Water Leak Detectors, Glass Break Detectors; Panels (*e.g.*, 2Gig, Qolsys, DSC panels), Servers, Call Centers, and/or Clouds, etc.); (3) DFW Smart Home or IOT systems (*e.g.*, DFW servers, call centers, or clouds); (4) DFW Applications and/or modules (*e.g.*, DFW App) (5) DFW Smart Home Devices (*e.g.*, Smart Locks, Smart Lights, Smart Thermostats, Smart Garage Doors, Smart Security, sensor lights, etc.); (6) current or legacy products or services, which use, or have used one or more of the foregoing products and services as a component product or component service; (7) combinations of products and/or services comprising, in whole or in part, two or more of the foregoing products and

services; and, (8) all other current or legacy products and services imported, made, used, sold, or offered for sale by DFW that operate, or have operated in a substantially similar manner as the above-listed products and services (one or more of the foregoing products and services are individually and collectively referred to as the accused “DFW Products and Services”). On information and belief, the DFW Products and Services infringe at least one claim of each of the Patents-in-Suit.

### **JURISDICTION AND VENUE**

9. This civil action arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.* Accordingly, this Court has subject matter jurisdiction under at least 28 U.S.C. §§ 1331 and 1338(a).

10. This Court has general and specific personal jurisdiction over Defendant because DFW regularly conducts and solicits business, or otherwise engages in other persistent courses of conduct in this judicial district, and/or derives substantial revenue from the use, sale, and distribution of goods and services, including but not limited to the accused DFW Products and Services provided to individuals and businesses in this district.

11. DFW has committed and continues to commit acts of infringement within this district and, thereby, giving rise to this action and establishing minimum contacts with this forum such that the exercise of jurisdiction over DFW would not offend traditional notion of fair play and substantial justice. In addition, this Court has personal jurisdiction over DFW at least for the following reasons:

(1) DFW has purposefully availed itself of the privileges of conducting business in the State of Texas; (2) DFW has sought privileges, protections and benefit from the laws of the State of Texas; (3) DFW regularly conducts business within the State of Texas and within this district, and Plaintiff’s cause of action arises directly from Defendant’s business contacts and other activities in the State of Texas and in this district, including deriving substantial revenue from the infringing DFW Products and Services in the State of Texas and this district.

12. On information and belief, DFW, on its own and/or via its subsidiaries, divisions,

partners, affiliates, and parent maintain a commercial presence in the United States, including in the State of Texas and in this judicial district, via at least (1) consumers residing in the District of Texas who purchase or utilize the DFW accused Products and Services. DFW actively opens, solicits, invites, advertises, and/or promotes the accused DFW Products and Services to residents, citizens, and customers of the United States and this judicial district; or (2) has opened, solicited, invited, advertised, and/or promoted the accused DFW Products and Services and to residents, citizens, and customers of the United States and this judicial district.

13. This Court has personal jurisdiction over DFW, at least, because it committed acts of infringement in this judicial district in violation of 35 U.S.C. § 271(a). Specifically, on information and belief, DFW has made, used, offered to sell access to, and/or sold access to the accused DFW Products and Services in this judicial district.

14. On information and belief, DFW has supported, marketed, made, distributed, offered to sell, and/or sold; or supports, markets, makes, distributes, offers to sell, and/or sells, the accused DFW Products and Services to consumers throughout the United States, the State of Texas, and residents of the District of Texas through various means.

15. On information and belief, DFW derives substantial revenue within the State of Texas from the offer of infringing products and services.

16. On information and belief, DFW, on its own and/or via its subsidiaries, divisions, partners, affiliates, and parent, infringe (either directly and/or indirectly) one or more of the claims of the Patents-in-Suit in this District.

17. Venue is proper pursuant to 28 U.S.C. §§ 1391 and/or 1400(b). Venue is proper at least because DFW has chosen to incorporate in the State of Texas, thereby receiving the benefits offered to Texas companies. DFW must accordingly assume responsibilities to Texas and its citizens.



**THE ASSERTED PATENTS**

**United States Patent No. 10,104,425**

18. On October 16, 2018, the United States Patent and Trademark Office (“USPTO”) duly and legally issued United States Patent No. 10,104,425 (“the ’425 patent”) entitled “Method and System for Efficient Communication” to inventors Tiejun Wang and Tiehong Wang.

19. The ’425 patent is presumed valid under 35 U.S.C. § 282. A true and correct copy of the ’425 patent is enclosed hereto.

20. Innovation Sciences owns all rights, title, and interest in the ’425 patent.

21. Innovation Sciences has not granted Defendant an approval, an authorization, or a license to rights under the ’425 patent.

22. The ’425 patent relates to, among other things, systems and corresponding devices that, *inter alia*, allow multimedia communications with different user terminals, and deliver multimedia information to multiple user terminals concurrently, dynamically, and efficiently.

23. The claimed invention(s) of the ’425 patent sought to solve technical problems in multimedia communications with different user terminals by delivering multimedia information to multiple user terminals concurrently, dynamically, and efficiently.

24. The claimed invention(s) of the ’425 patent have numerous applications including but not limited to: efficiently directing communications on a network; directing a television display from a mobile terminal; conversion and routing of content to devices that employ differing communication protocols is provided; bidirectional conversion and routing of content to differing devices; remotely receiving and accommodating completion of multimedia content requests from a plurality of content sources; and methods for optimizing the delivery of content that is commonly requested by a plurality of users in a particular location is provided.

25. The inventions of the '425 patent can be implemented in various forms including, but not limited to business processes, computer implemented methods, computer program products, computer systems and networks, user interfaces, application programming interfaces as well as other similar areas.

**United States Patent No. 10,469,898**

26. On November 5, 2019, the United States Patent and Trademark Office ("USPTO") duly and legally issued United States Patent No. 10,469,898 ("the '898 patent") entitled "Method and System for Efficient Communication" to inventors Tiejun Wang and Tiehong Wang.

27. The '898 patent is presumed valid under 35 U.S.C. § 282. A true and correct copy of the '898 patent is enclosed hereto.

28. Innovation Sciences owns all rights, title, and interest in the '898 patent.

29. Innovation Sciences has not granted Defendant an approval, an authorization, or a license to rights under the '898 patent.

30. The '898 patent contains related application data to the '425 patent. The '898 patent specification is nearly identical to the specification of the '425 patent and solves the problems described in the '425 patent.

**United States Patent No. 11,109,094**

31. On July 30, 2019, the USPTO duly and legally issued United States Patent No. 11,109,094 ("the '094 patent") entitled "Method and System for Efficient Communication" to inventors Tiejun Wang and Anne Wong.

32. The '094 patent is presumed valid under 35 U.S.C. § 282. A true and correct copy of the '094 patent is enclosed hereto.

33. Innovation Sciences owns all rights, title, and interest in the '094 patent.

34. Innovation Sciences has not granted Defendant an approval, an authorization, or a license to rights under the '094 patent.

35. The '094 patent contains related application data to the '425 patent. The '094 patent specification is nearly identical to the specification of the '425 patent and solves the problems described in the '425 patent.

### **CLAIMS FOR RELIEF**

#### **Count I – Infringement of United States Patent No. 10,104,425**

36. Innovation Sciences repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

37. On information and belief, DFW is violating 35 U.S. C. § 271(a) with respect to one or more claims of the '425 patent.

38. On information and belief, DFW (or those acting on its behalf) (i) makes, uses, sells, sells access to, imports, offers to sell and/or offers to sell access to the DFW Products and Services in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 44 of the '425 patent.

39. On information and belief, one or more components of the DFW Products and Services is a wireless device (e.g., DFW Home Security Hub).




#### **The Ultimate Home Security Hub**

- 7" Touchscreen
- Encrypted Data Transmission
- Built-in Glass Break Detector
- Panel Camera for Disarm Photos
- Location-Based GEO Fencing
- Secure Wireless Monitoring - 5G & 6G Ready
- Arming Reminders and Alerts
- Bluetooth Touchless Disarming

See <https://www.dfwsecurity.com/home-security/smart-security>.


40. On information and belief, the wireless device (e.g., DFW Home Security Hub) comprises a network interface configured to communicate via a WiFi network.


## CONNECTING TO WI-FI




To connect to a Wi-Fi network, follow the steps below:

Swipe down from the top menu bar and select settings.

 Touch Advanced Settings (Installer Code)


 Then touch "Wi-Fi"


 Enable Wi-Fi if not already active


Available networks appear in a list. Touch the desired network and use the keyboard to type the password (if required).


**Note:** Frequency, PMF and more can be changed under Advanced Settings


**Activate WIFI**


 Qolsys-5G  
Connected

 Now Communications


 Qolsys

 Sunset Room

 Vertical Ops 2.4

 Add wi-fi network

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 95.



**Access Point Connected Devices**

View connected device information such as IP, MAC address and for how long the device has been connected.

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 93.

Panel	MAC Address:
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See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 164.

**Battery & Radios**

Touch an icon to get more information

- Battery level
- Wi-Fi connection
- Bluetooth status
- LTE connection

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p.8.

Wireless	WiFi	Wi-Fi 802.11 a/b/g/n/ac dual band 2.4/5ghz - including built-in router capability
	Image Sensor	Supports up to 5 Alarm.com Image Sensors (if included)
	Z-Wave	Supports up to 152 devices (80 lights, 15 Smart Sockets, 20 Locks, 10 Thermostats, 21 Misc, 6 Garage Doors)
	Cellular	LTE (Bands 2,4,5,12,13,17)
	Security R/F	Up to 128 RF Zones. IQ Panel 2 uses Encrypted 319.5MHz. IQ Panel 2+ uses PowerG plus ONE of the following depending on SKU: Encrypted 319.5MHz, 345MHz or 433MHz.
	Bluetooth	Qualcomm Bluetooth Low Energy (BLE) 4.0

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 177.

41. On information and belief, the wireless device's (e.g., DFW Home Security Hub) WiFi network is separate from a short range wireless communication channel (e.g., Z-wave).









### Z-Wave™ Test

A series of Z-Wave tests to optimize your smart home network. "Reconfigure network" is your most useful test, repairing your network for you.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p.11.

Wireless	WiFi	Wi-Fi 802.11 a/b/g/n/ac dual band 2.4/5ghz - including built-in router capability
	Image Sensor	Supports up to 5 Alarm.com Image Sensors (if included)
	Z-Wave	Supports up to 152 devices (80 lights, 15 Smart Sockets, 20 Locks, 10 Thermostats, 21 Misc, 6 Garage Doors)
	Cellular	LTE (Bands 2,4,5,12,13,17)
	Security R/F	Up to 128 RF Zones. IQ Panel 2 uses Encrypted 319.5MHz. IQ Panel 2+ uses PowerG plus ONE of the following depending on SKU: Encrypted 319.5MHz, 345MHz or 433MHz.
	Bluetooth	Qualcomm Bluetooth Low Energy (BLE) 4.0

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 177.

	<b>Wi-Fi Test</b> Test the panel's connection to the wireless (Wi-Fi) network		<b>Z-Wave Tests</b> Test communication between devices and the panel. Rediscover network, counters, neighbor info, diagnostics & advanced diagnostics
	<b>Sensor Test</b> Shows actual dBm signal strength of each sensor and graphs sensor events against the ambient noise floor of the environment		<b>PowerG Test</b> Ping and receive simple signal strength from a PowerG sensor.
	<b>Cellular Test</b> Test the panel's connection to the cellular network and Alarm.com		<b>PowerG Signal Strength</b> Graphs and shows dBm signal strength for PowerG sensors.

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 120.

42. On information and belief, the wireless device (*e.g.*, DFW Home Security Hub) comprises a processor (*e.g.*, programmable action are carried out); and a memory (*e.g.*, NAND flash), the memory storing instructions that, when executed by the processor, cause the processor to perform operations.



#### The Ultimate Home Security Hub

- 7" Touchscreen
- Encrypted Data Transmission
- Built-in Glass Break Detector
- Panel Camera for Disarm Photos
- Location-Based GEO Fencing
- Secure Wireless Monitoring - 5G & 6G Ready
- Arming Reminders and Alerts
- Bluetooth Touchless Disarming

See <https://www.dfwsecurity.com/home-security/smart-security>

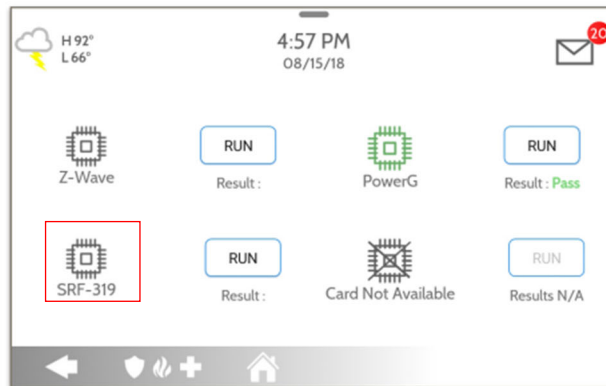


### Daughter Cards Test

Tests the integrity of installed daughter cards. Slots not populated will be "greyed" out and inaccessible to test.

### Remove All Devices (Factory Default Reset)

If this controller is the primary controller for your network, resetting it will result in the nodes in your network being orphaned and it will be necessary after the reset to exclude and re-include all of the nodes in the network. If this controller is being used as a secondary controller in the network, use this procedure to reset this controller only in the event that the network primary controller is missing or otherwise inoperable.



Select "Run" on an individual available card to start the test. In some cases the test may take several minutes after which the panel will show a result of a "Pass" or "Fail".

If the test results in "Fail" double check the daughter card connection, reboot the panel and rerun the test again.

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 95, 136.

Hardwire Input	Wired x2	2 non powered closed loop circuit with 4.7k EOL resistor
Siren Output	Wired x1	1 controlled output (open collector), 300mA max with a 12v power supply wired in series. <b>NOTE:</b> For UL/cUL external siren is for supplementary use only
Flash Memory	Internal Storage	12GB NAND Flash
SD Card Slot	Push-Push	Micro SD slot x 1

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 178.

### Sensor List

Open or active sensors appear in a scrollable list on the right. Touch the icons in the upper right corner to switch your view to either "Active" or "All" sensors.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p.5.

43. On information and belief, the wireless device (e.g., the DFW Home Security Hub) stores (e.g., in memory) an identifier of a sensing device (e.g., ID of the door, window, etc.) for security monitoring.

Hardwire Input	Wired x2	2 non powered closed loop circuit with 4.7k EOL resistor
Siren Output	Wired x1	1 controlled output (open collector), 300mA max with a 12v power supply wired in series. <b>NOTE:</b> For UL/cUL external siren is for supplementary use only
Flash Memory	Internal Storage	12GB NAND Flash
SD Card Slot	Push-Push	Micro SD slot x 1



See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 178.

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Open or active sensors appear in a scrollable list on the right. Touch the icons in the upper right corner to switch your view to either "Active" or "All" sensors.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p.5



## Access Point Connected Devices

View connected device information such as IP, MAC address and for how long the device has been connected.

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 93.

## SENSOR STATUS

**Sensor Status**  
 Monitor sensor status in real time for things like open, close, tamper, idle and low battery.

H 101°  
L 64°

12:29 PM  
Jul 23 2019

NO	PTID	ID	SIGNAL SOURCE	NAME	TYPE	GROUP	STATUS
1	1	12BEA1	G	Upstairs Motion Detector	Motion	17-Away-Instant Motion	Idle
2	1	12BEA2	G	Downstairs Motion Detector	Motion	17-Away-Instant Motion	Idle
3	1	12BEA3	G	Front Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
4	1	12BEA4	G	Laundry Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
5	1	12BEA5	G	Back Door	Door/Window	13-Instant	Open







This page also allows you to quickly review programming for things like Zone number, Partition, Signal Source (319, 345, 433, PowerG, Native or Zigbee), Sensor Name, Sensor Type and Sensor Group.

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 84.

44. On information and belief, the wireless device (*e.g.*, the DFW Home Security Hub) receiving a wireless signal from the sensing device through the short range wireless communication channel (*e.g.*, Z-Wave, etc.), the wireless signal comprising information corresponding to an identifier



of the sensing device, the wireless signal triggered by detection, by the sensing device, of a change of a condition (e.g., intrusion, glass break, opened window, etc.).


 <p><b>Wi-Fi Test</b> Test the panel's connection to the wireless (Wi-Fi) network</p>	 <p><b>Z-Wave Tests</b> Test communication between devices and the panel. Rediscover network, counters, neighbor info, diagnostics &amp; advanced diagnostics</p>
 <p><b>Sensor Test</b> Shows actual dBm signal strength of each sensor and graphs sensor events against the ambient noise floor of the environment</p>	 <p><b>PowerG Test</b> Ping and receive simple signal strength from a PowerG sensor.</p>
 <p><b>Cellular Test</b> Test the panel's connection to the cellular network and Alarm.com</p>	 <p><b>PowerG Signal Strength</b> Graphs and shows dBm signal strength for PowerG sensors.</p>

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 120.


Motion Detector	Glassbreak Detector	Door or Window Sensor
-Wireless Motion Detector	-Detects the Sound of Glass Breaking	-Wireless 2-Piece Contact
-Pet Immune up to 30 Pounds (single pet)	-Can cover Multiple Windows in a Single Room	-View Status on Mobile App
-Detects Motion on One Room (line of sight)		

See <https://www.dfwsecurity.com/products>

## SENSOR STATUS




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Monitor sensor status in real time for things like open, close, tamper, idle and low battery.



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L 64°

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Jul 23 2019



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3	1	12BEA3	G	Front Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
4	1	12BEA4	G	Laundry Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
5	1	12BEA5	G	Back Door	Door/Window	13-Instant	Open

This page also allows you to quickly review programming for things like Zone number, Partition, Signal Source (319, 345, 433, PowerG, Native or Zigbee), Sensor Name, Sensor Type and Sensor Group.

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 84.

45. On information and belief, the wireless device (e.g., the DFW Home Security Hub) identifies the sensing device based on the identifier (e.g., is aware of the specific sensor).

Wireless	WiFi	Wi-Fi 802.11 a/b/g/n/ac dual band 2.4/5ghz - including built-in router capability
	Image Sensor	Supports up to 5 Alarm.com Image Sensors (if included)
	Z-Wave	Supports up to 152 devices (80 lights, 15 Smart Sockets, 20 Locks, 10 Thermostats, 21 Misc, 6 Garage Doors)
	Cellular	LTE (Bands 2,4,5,12,13,17)
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## Sensor List


Open or active sensors appear in a scrollable list on the right. Touch the icons in the upper right corner to switch your view to either "Active" or "All" sensors.

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3	1	12BEA3	G	Front Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
4	1	12BEA4	G	Laundry Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
5	1	12BEA5	G	Back Door	Door/Window	13-Instant Detector DAW	Open

This page also allows you to quickly review programming for things like Zone number, Partition, Signal Source (319, 345, 433, PowerG, Native or Zigbee), Sensor Name, Sensor Type and Sensor Group.

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 84.



Home Security Small Business Commercial Resources Log In

214-239-8163

Easily add Home Automation components to your Smart Security System for unprecedented control of your entire home with a single award-winning App.



See <https://www.dfwsecurity.com/home-security/smart-security>.

46. On information and belief, the wireless device (*e.g.*, the DFW Home Security Hub) initiates communication, via the network interface, of information regarding a status update based on the wireless signal.

### SENSOR STATUS

**Sensor Status**  
Monitor sensor status in real time for things like open, close, tamper, idle and low battery.

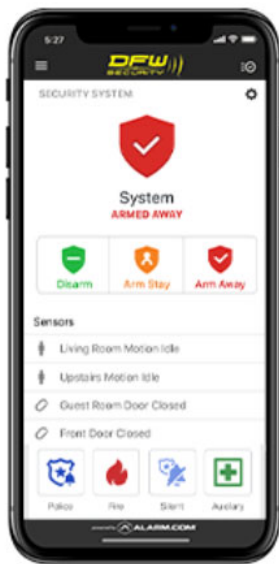
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Jul 23 2019

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4	1	12BEA4	G	Laundry Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
5	1	12BEA5	G	Back Door	Door/Window	13-Instant	Open

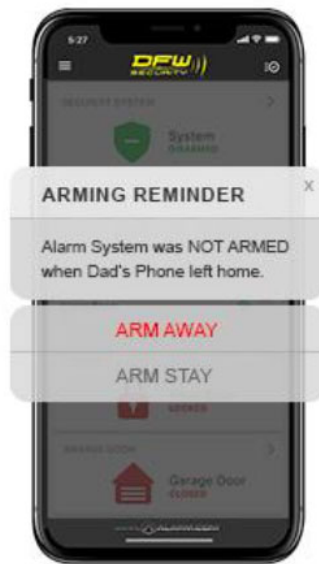
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See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 84.



### Simple Convenience

Our award-winning mobile app allows you to control your system from anywhere. Works with phones, tablets, Apple watch, Alexa and Google Home.



### Notifications and Alerts

Customized notifications so you'll know who's coming and going. Reminders so you'll never forget to arm your home security system again.

### Mobile Application

Manage your home's security with a powerful app that is straightforward and easy to use. Quickly check system and sensor status and view activity history. Arm or disarm with one click. We're constantly adding new features to make your life more simple and secure.

### We Keep You Informed

Text and email alerts from DFW Security ensure you are instantly notified about any type of alarm at your home or business, as well as other activity you want to know about.

See <https://www.dfwsecurity.com/home-security/smart-security>



Home Security Small Business Commercial Resources Log In

214-239-8163

Easily add Home Automation components to your Smart Security System for unprecedented control of your entire home with a single award-winning App.



See <https://www.dfwsecurity.com/home-security/smart-security>

47. On information and belief, the wireless device (e.g., the DFW Home Security Hub) is further configured to receive a compressed digital multimedia signal corresponding to a multimedia content (e.g., audio and video compressed signals for production of corresponding multimedia content, two-way voice, etc.).

#### Help in an Instant

Two Way Communication, also known as 2-Way Voice, allows for faster communication in an emergency, because our monitoring agent can speak directly into your home through the loudspeaker on your keypad.

See <https://www.dfwsecurity.com/home-security/smart-security>



### Live View

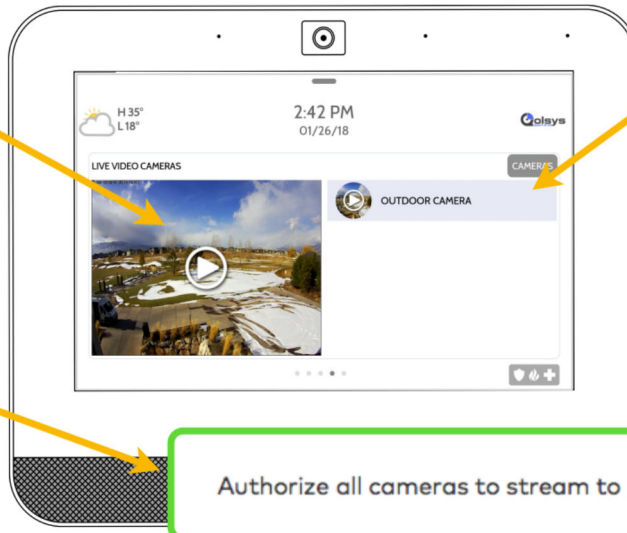
Easily view the live video feed from your Alarm.com video cameras on the 7" panel screen. This page will appear automatically if cameras are added to the account and the authorization has been given on the Alarm.com customer website. Supports live view of up to 40 cameras.

#### Camera View

A thumbnail of the camera will be displayed for the highlighted camera. Click the play button to view full screen.

#### Important Note

Cameras will only push to your panel if you have authorized them to do so from your Alarm.com customer website. This can be found under Video Settings.



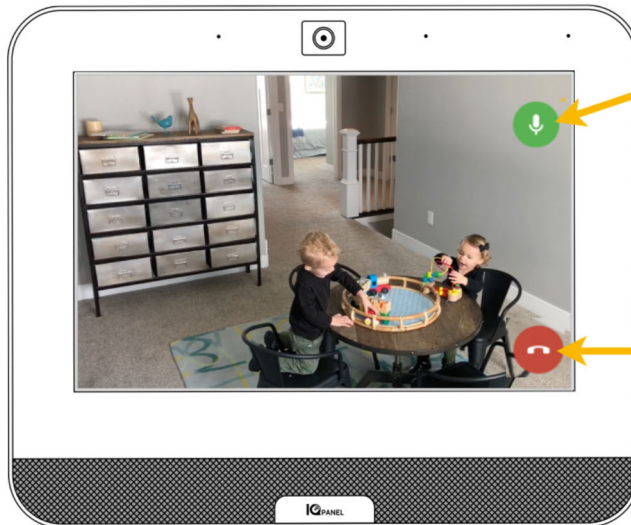
#### Cameras List

All supported cameras that are on the account and have been authorized will show here. Click the camera you would like to view.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 16.

### Live View with Audio

Listen in and speak to any room in the house using the Golsys Live View with Audio feature. This can be done from your mobile app or right from the 7" touch screen. If your camera supports two-way audio, the talk button will automatically appear on the live view page.



#### Talk

Press and hold while talking to use the two-way audio feature built into your camera.

#### End

Press this button to exit.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 17.

### Awareness Made Simple

View live and recorded video in an instant with apps for tablets, phones and smart watches. View multiple cameras or locations on one app. Quickly and easily find saved clips. Get alerts and notifications with video clips attached.

See <https://www.dfwsecurity.com/home-security>

48. On information and belief, the wireless device (*e.g.*, the DFW Home Security Hub) further comprises a decoder configured to decompress the compressed digital multimedia signal accommodate production of the multimedia content on a digital display (*e.g.*, the compressed signals from the sensors must be decoded to display the corresponding contents).

### Help in an Instant

Two Way Communication, also known as 2-Way Voice, allows for faster communication in an emergency, because our monitoring agent can speak directly into your home through the loudspeaker on your keypad.

See <https://www.dfwsecurity.com/home-security/smart-security>

#### Live View

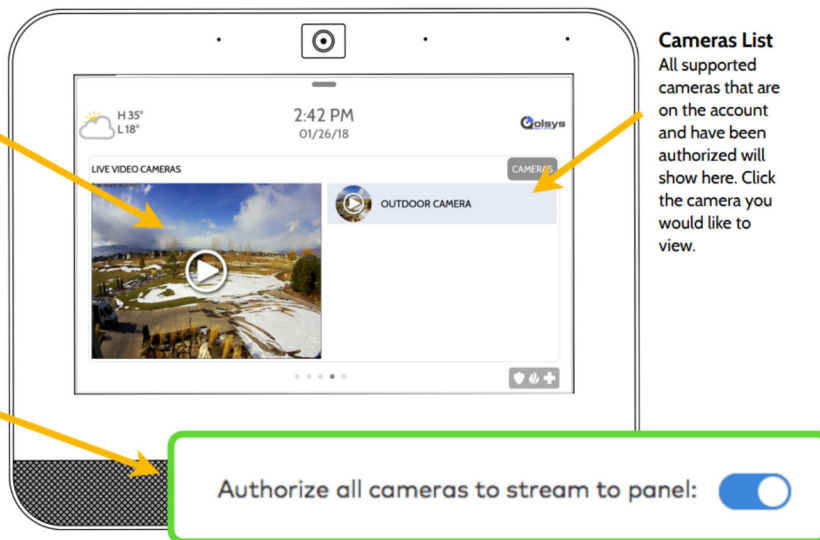
Easily view the live video feed from your Alarm.com video cameras on the 7" panel screen. This page will appear automatically if cameras are added to the account and the authorization has been given on the Alarm.com customer website. Supports live view of up to 40 cameras.

#### Camera View

A thumbnail of the camera will be displayed for the highlighted camera. Click the play button to view full screen.

#### Important Note

Cameras will only push to your panel if you have authorized them to do so from your Alarm.com customer website. This can be found under Video Settings.



#### Cameras List

All supported cameras that are on the account and have been authorized will show here. Click the camera you would like to view.

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Listen in and speak to any room in the house using the Qolsys Live View with Audio feature. This can be done from your mobile app or right from the 7" touch screen. If your camera supports two-way audio, the talk button will automatically appear on the live view page.



See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 17.

**Awareness Made Simple**

View live and recorded video in an instant with apps for tablets, phones and smart watches. View multiple cameras or locations on one app. Quickly and easily find saved clips. Get alerts and notifications with video clips attached.

See <https://www.dfwsecurity.com/home-security>.

49. On information and belief, DFW directly infringes at least claim 1 of the '425 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the DFW Products and Services.

50. Innovation Sciences has been damaged by Defendant's infringement and has caused / continues to cause it to suffer irreparable harm and damages as a result of the infringement.

**Count II – Infringement of United States Patent No. 10,469,898**

51. Innovation Sciences repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

52. On information and belief, DFW is violating 35 U.S. C. § 271(a) with respect to one or more claims of the '898 patent.



53. On information and belief, DFW (or those acting on its behalf) (i) makes, uses, sells, sells access to, imports, offers to sell and/or offers to sell access to the DFW Products and Services in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 10 of the '898 patent.

54. On information and belief, one or more components of the DFW Products and Services (e.g., DFW Smart Home Security System) provides a method for communicating information by a centralized HUB system (e.g., alarm panel, hereinafter the “DFW Hub”) with a device identifier (e.g., MAC address, serial number, name given by the user, etc.).



#### The Ultimate Home Security Hub

- 7" Touchscreen
- Encrypted Data Transmission
- Built-in Glass Break Detector
- Panel Camera for Disarm Photos
- Location-Based GEO Fencing
- Secure Wireless Monitoring - 5G & 6G Ready
- Arming Reminders and Alerts
- Bluetooth Touchless Disarming

#### Smart Home Expandable

Our Security Panel also acts as a hub for smart home technology like thermostats, lights, cameras, locks and garage doors. Home Automation components can be added and seamlessly controlled in the same app.

See <https://www.dfwsecurity.com/home-security/smart-security>


Panel	MAC Address:
-------	--------------

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 164.





55. On information and belief, one or more components of the DFW Products and Services (e.g., DFW Smart Home Security System) provides a method for communicating configured data (e.g., IP address, MAC address, etc.) in initiating communications that are directed to the centralized HUB system (e.g., DFW Hub), the configured data comprising information corresponding to a network

address (*e.g.*, IP address and/or the Hub's MAC address) associated with a wireless local area network and information corresponding to the device identifier (*e.g.*, serial number, Device ID, name given by the user, etc. of the DFW Hub).

## CONNECTING TO WI-FI




To connect to a Wi-Fi network, follow the steps below:


-  Swipe down from the top menu bar and select settings.
-  Touch Advanced Settings (Installer Code)
-  Then touch "Wi-Fi"
-  Enable Wi-Fi if not already active


Available networks appear in a list. Touch the desired network and use the keyboard to type the password (if required).


**Note:** Frequency, PMF and more can be changed under Advanced Settings


Activate WIFI


 Qolsys-5G  
Connected

 Now Communications

 Qolsys

 Sunset Room

 Vertical Ops 2.4

 Add wi-fi network

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 95.



### Access Point Connected Devices

View connected device information such as IP, MAC address and for how long the device has been connected.

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 93.


Panel	MAC Address:
-------	--------------

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 164.

56. On information and belief, one or more components of the DFW Products and Services (*e.g.*, DFW Smart Home Security System) provides that the network address (*e.g.*, IP address or MAC


address) is associated with the device identifier (e.g., serial number, Device ID, name given by the user, etc.).

## CONNECTING TO WI-FI




To connect to a Wi-Fi network, follow the steps below:


Swipe down from the top menu bar and select settings.



Touch Advanced Settings (Installer Code)



Then touch “Wi-Fi”





Enable Wi-Fi if not already active


Available networks appear in a list. Touch the desired network and use the keyboard to type the password (if required).


**Note:** Frequency, PMF and more can be changed under Advanced Settings


Activate WIFI


 Qolsys-5G  
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Panel	MAC Address:
-------	--------------

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 164.

Every computer or device on the internet has two types of addresses: a physical address and an internet address.

The physical address -- or media access control ([MAC](#)) address -- identifies a device to other devices on the same local network. The internet address -- or IP address -- identifies the device globally. A [network packet](#) needs both addresses to get to its destination.

See <https://www.techtarget.com/searchnetworking/answer/What-is-the-difference-between-an-IP-address-and-a-physical-address>.

Address Resolution Protocol (ARP) is a protocol or procedure that connects an ever-changing Internet Protocol (IP) address to a fixed physical machine address, also known as a media access control (MAC) address, in a local-area network (LAN).

See <https://www.fortinet.com/resources/cyberglossary/what-is-arp>.

57. On information and belief, one or more components of the DFW Products and Services (e.g., DFW Smart Home Security System) performs communicating, via a network interface (e.g., Wi-Fi interface or radio frequency) and via a network communication channel of the wireless local area network (e.g., Wi-Fi network), information about an updated status (e.g., detected by a sensor and communicated by Z-wave) in connection with a wireless signal transmitted through a wireless channel regarding the updates status, the wireless channel regarding the updated status, the wireless signal comprising information corresponding to a unique identifier (e.g., the information included in the user's account) associated with the home device or the office device, the unique identifier associated with a unique phone identifier of a cellular phone (e.g., phone number associated with the cellular phone having the DFW App).

#### Battery & Radios

Touch an icon to get more information

- Battery level
- Wi-Fi connection
- Bluetooth status
- LTE connection



#### Z-Wave™ Test

A series of Z-Wave tests to optimize your smart home network. "Reconfigure network" is your most useful test, repairing your network for you.



#### Dual Path Test

Run this test if your panel seems to have lost its ability to send and receive signals.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p.8, p.11

Wireless	WiFi	Wi-Fi 802.11 a/b/g/n/ac dual band 2.4/5ghz - including built-in router capability
	Image Sensor	Supports up to 5 Alarm.com Image Sensors (if included)
	Z-Wave	Supports up to 152 devices (80 lights, 15 Smart Sockets, 20 Locks, 10 Thermostats, 21 Misc, 6 Garage Doors)
	Cellular	LTE (Bands 2,4,5,12,13,17)
	Security R/F	Up to 128 RF Zones. IQ Panel 2 uses Encrypted 319.5MHz. IQ Panel 2+ uses PowerG plus ONE of the following depending on SKU: Encrypted 319.5MHz, 345MHz or 433MHz.
	Bluetooth	Qualcomm Bluetooth Low Energy (BLE) 4.0

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 177.

**Wi-Fi Test**

Test the panel's connection to the wireless (Wi-Fi) network

**Sensor Test**

Shows actual dBm signal strength of each sensor and graphs sensor events against the ambient noise floor of the environment

**Cellular Test**

Test the panel's connection to the cellular network and Alarm.com

**Z-Wave Tests**

Test communication between devices and the panel. Rediscover network, counters, neighbor info, diagnostics & advanced diagnostics

**PowerG Test**

Ping and receive simple signal strength from a PowerG sensor.

**PowerG Signal Strength**

Graphs and shows dBm signal strength for PowerG sensors.

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 120.

Motion Detector	Glassbreak Detector	Door or Window Sensor
-Wireless Motion Detector	-Detects the Sound of Glass Breaking	-Wireless 2-Piece Contact
-Pet Immune up to 30 Pounds (single pet)	-Can cover Multiple Windows in a Single Room	-View Status on Mobile App
-Detects Motion on One Room (line of sight)		

See <https://www.dfwsecurity.com/products>)

**SENSOR STATUS**

**Sensor Status**  
 Monitor sensor status in real time for things like open, close, tamper, idle and low battery.

H 101°  
L 64°

12:29 PM  
Jul 23 2019

NO	PTID	ID	SIGNAL SOURCE	NAME	TYPE	GROUP	STATUS
1	1	12BEA1	G	Upstairs Motion Detector	Motion	17-Away-Instant Motion	Idle
2	1	12BEA2	G	Downstairs Motion Detector	Motion	17-Away-Instant Motion	Idle
3	1	12BEA3	G	Front Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
4	1	12BEA4	G	Laundry Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
5	1	12BEA5	G	Back Door	Door/Window	13-Instant	Open

This page also allows you to quickly review programming for things like Zone number, Partition, Signal Source (319, 345, 433, PowerG, Native or Zigbee), Sensor Name, Sensor Type and Sensor Group.

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 84


### Mobile Application

Manage your home's security with a powerful app that is straightforward and easy to use. Quickly check system and sensor status and view activity history. Arm or disarm with one click. We're constantly adding new features to make your life more simple and secure.


See <https://www.dfwsecurity.com/home-security/smart-security>

58. On information and belief, one or more components of the DFW Products and Services (e.g., DFW Smart Home Security System) provides that the information about the updated status (e.g., intrusions, emergencies) is communicated to a user in connection with recognition of the unique identifier.


### SENSOR STATUS



**Sensor Status**  
 Monitor sensor status in real time for things like open, close, tamper, idle and low battery.


 H 101°  
L 64°

12:29 PM  
Jul 23 2019

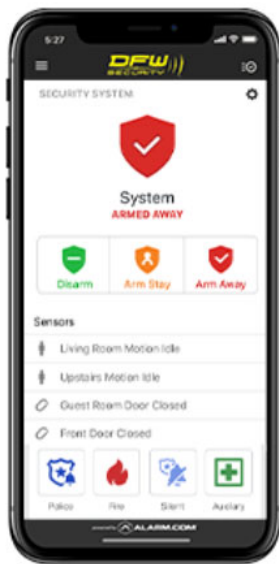


NO	PTID	ID	SIGNAL SOURCE	NAME	TYPE	GROUP	STATUS
1	1	12BEA1	G	Upstairs Motion Detector	Motion	17-Away-Instant Motion	Idle
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3	1	12BEA3	G	Front Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
4	1	12BEA4	G	Laundry Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
5	1	12BEA5	G	Back Door	Door/Window	13-Instant	Open

This page also allows you to quickly review programming for things like Zone number, Partition, Signal Source (319, 345, 433, PowerG, Native or Zigbee), Sensor Name, Sensor Type and Sensor Group.

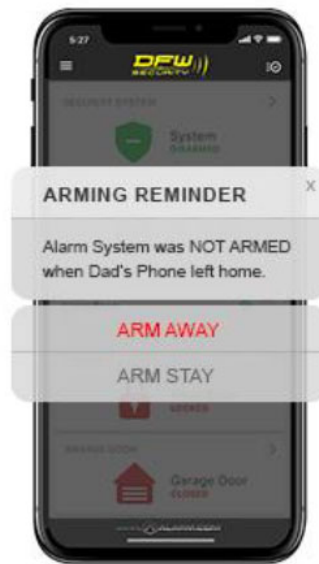
See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 84.





### Simple Convenience

Our award-winning mobile app allows you to control your system from anywhere. Works with phones, tablets, Apple watch, Alexa and Google Home.



### Notifications and Alerts

Customized notifications so you'll know who's coming and going. Reminders so you'll never forget to arm your home security system again.

### Mobile Application

Manage your home's security with a powerful app that is straightforward and easy to use. Quickly check system and sensor status and view activity history. Arm or disarm with one click. We're constantly adding new features to make your life more simple and secure.

### We Keep You Informed

Text and email alerts from DFW Security ensure you are instantly notified about any type of alarm at your home or business, as well as other activity you want to know about.

See <https://www.dfwsecurity.com/home-security/smart-security>

59. On information and belief, one or more components of the DFW Products and Services (e.g., DFW Smart Home Security System) provides that the information about the updated status (e.g.,

away, stay) is communicated to the user according to a configuration setting (e.g., specifying how to notify the user about the updated status).

### Arming Options

Quickly choose from “stay” or “away”



#### Arming Stay

Arms doors and windows only



#### Arming Away

Arms doors, windows and motions

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p.4.

### Mobile Application

Manage your home’s security with a powerful app that is straightforward and easy to use. Quickly check system and sensor status and view activity history. Arm or disarm with one click. We’re constantly adding new features to make your life more simple and secure.

### We Keep You Informed

Text and email alerts from DFW Security ensure you are instantly notified about any type of alarm at your home or business, as well as other activity you want to know about.

See <https://www.dfwsecurity.com/home-security/smart-security>.

60. On information and belief, one or more components of the DFW Products and Services (e.g., DFW Smart Home Security System) provides that the configuration setting specifies when and how to notify the user about the updates status (e.g., the user is alerted when conditions are met by creating custom rules).

### We Keep You Informed

Text and email alerts from DFW Security ensure you are instantly notified about any type of alarm at your home or business, as well as other activity you want to know about.

See <https://www.dfwsecurity.com/home-security/smart-security>

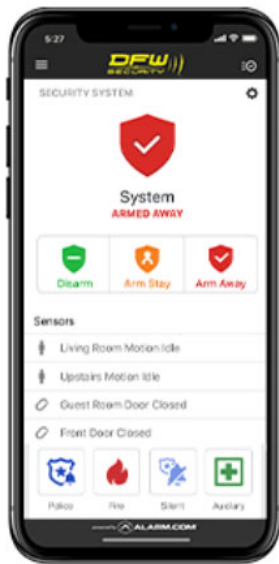


## PARTITIONS

The IQ4 Hub allows for up to 4 partitions to be programmed. Partitions allows for the creation of zone groups in a home or building so that users can arm some sections of the property while leaving other areas disarmed. Partitioning enables greater personalization and functionality while simplifying installation. Each partition controls its local zone status, alerts and notifications. Any area or zone the needs to be armed or disarmed separately from the rest of the structure can be turned into a partition.

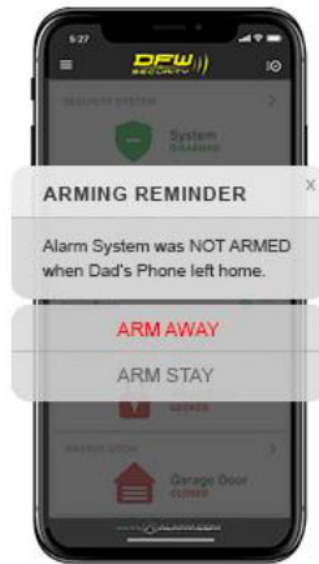
See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p.21.

61. On information and belief, one or more components of the DFW Products and Services (e.g., DFW Smart Home Security System) provides that the message about the updated status (e.g., alerts or notifications) is communicated to the cellular phone (e.g., via text or the DFW App).



### Simple Convenience

Our award-winning mobile app allows you to control your system from anywhere. Works with phones, tablets, Apple watch, Alexa and Google Home.



### Notifications and Alerts

Customized notifications so you'll know who's coming and going. Reminders so you'll never forget to arm your home security system again.

### Mobile Application







Manage your home's security with a powerful app that is straightforward and easy to use. Quickly check system and sensor status and view activity history. Arm or disarm with one click. We're constantly adding new features to make your life more simple and secure.

### We Keep You Informed

Text and email alerts from DFW Security ensure you are instantly notified about any type of alarm at your home or business, as well as other activity you want to know about.

See <https://www.dfwsecurity.com/home-security/smart-security>)

62. On information and belief, one or more components of the DFW Products and Services (e.g., DFW Smart Home Security System) provides that the method further comprises receiving a signal (e.g., video, two-way audio, etc. via Wi-Fi) from the wireless local area network.

 <p><b>Wi-Fi Test</b> Test the panel's connection to the wireless (Wi-Fi) network</p>	 <p><b>Z-Wave Tests</b> Test communication between devices and the panel. Rediscover network, counters, neighbor info, diagnostics &amp; advanced diagnostics</p>
 <p><b>Sensor Test</b> Shows actual dBm signal strength of each sensor and graphs sensor events against the ambient noise floor of the environment</p>	 <p><b>PowerG Test</b> Ping and receive simple signal strength from a PowerG sensor.</p>
 <p><b>Cellular Test</b> Test the panel's connection to the cellular network and Alarm.com</p>	 <p><b>PowerG Signal Strength</b> Graphs and shows dBm signal strength for PowerG sensors.</p>

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 120.

### Help in an Instant

Two Way Communication, also known as 2-Way Voice, allows for faster communication in an emergency, because our monitoring agent can speak directly into your home through the loudspeaker on your keypad.

See <https://www.dfwsecurity.com/home-security/smart-security>

**Live View**

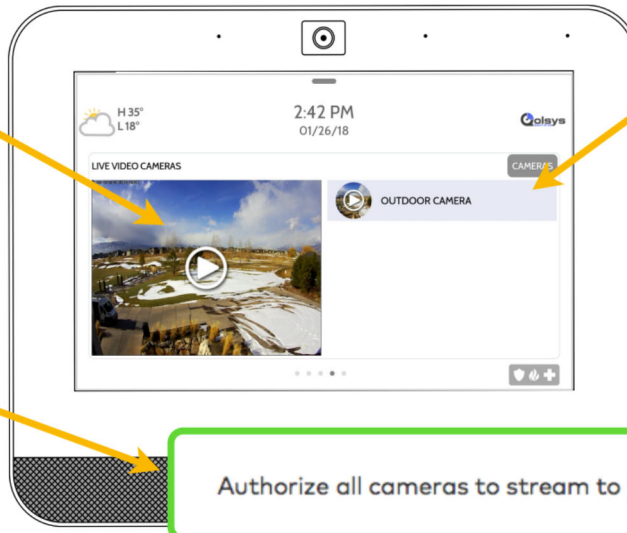
Easily view the live video feed from your Alarm.com video cameras on the 7" panel screen. This page will appear automatically if cameras are added to the account and the authorization has been given on the Alarm.com customer website. Supports live view of up to 40 cameras.

**Camera View**

A thumbnail of the camera will be displayed for the highlighted camera. Click the play button to view full screen.

**Important Note**

Cameras will only push to your panel if you have authorized them to do so from your Alarm.com customer website. This can be found under Video Settings.

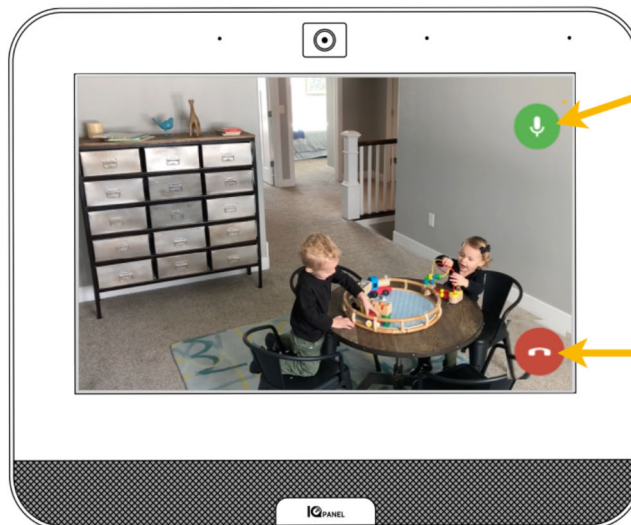
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See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 16)

**Live View with Audio**

Listen in and speak to any room in the house using the Golsys Live View with Audio feature. This can be done from your mobile app or right from the 7" touch screen. If your camera supports two-way audio, the talk button will automatically appear on the live view page.

**Talk**

Press and hold while talking to use the two-way audio feature built into your camera.

**End**

Press this button to exit.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 17.

63. On information and belief, one or more components of the DFW Products and Services (e.g., DFW Smart Home Security System) performs a conversion of the signal by a converter (e.g., two-way audio communicated between the DFW Hub and video cameras) to accommodate production of a corresponding information content, the signal comprising a compressed signal.

## Help in an Instant

Two Way Communication, also known as 2-Way Voice, allows for faster communication in an emergency, because our monitoring agent can speak directly into your home through the loudspeaker on your keypad.

See <https://www.dfwsecurity.com/home-security/smart-security>

### Live View

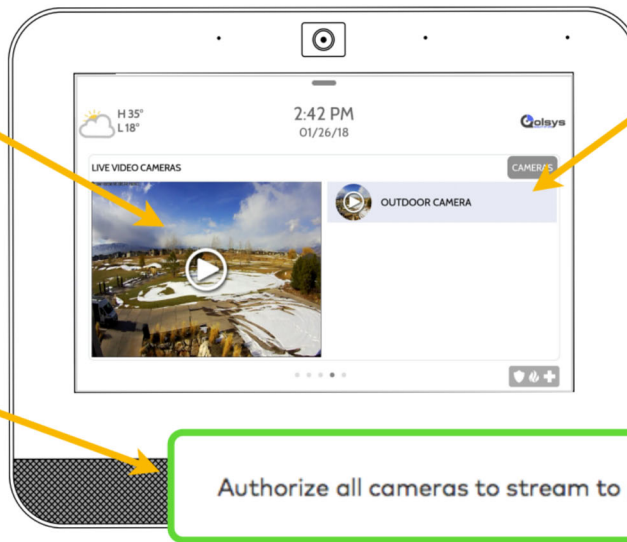
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See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 17

**Awareness Made Simple**

View live and recorded video in an instant with apps for tablets, phones and smart watches. View multiple cameras or locations on one app. Quickly and easily find saved clips. Get alerts and notifications with video clips attached.

See <https://www.dfwsecurity.com/home-security>)

**Flexible Recording**

Smart Recording makes collecting and finding important footage easy and fast. You set exactly what you want to see, and your clips are stored securely in a searchable library in the cloud. Recording can be triggered by events, motion, schedule or on demand. Select an SVR for recording 24/7.

See <https://www.dfwsecurity.com/security-cameras/outdoor-indoor-cameras>

64. On information and belief, one or more components of the DFW Products and Services (e.g., DFW Smart Home Security System) provides decompressing (e.g., DFW Hub decompresses) the compressed signal by a decoder (e.g., decoders in the DFW Hub), the conversion comprising said decompressing the compressed signal by the decoder, the decoder included in the converter (e.g., the

two-way audio communicated between the DFW Hub and video cameras are compressed for Wi-Fi or cellular network transmission for efficient bandwidth usage to maintain high quality communication).

### Help in an Instant

Two Way Communication, also known as 2-Way Voice, allows for faster communication in an emergency, because our monitoring agent can speak directly into your home through the loudspeaker on your keypad.

See <https://www.dfwsecurity.com/home-security/smart-security>

#### Live View

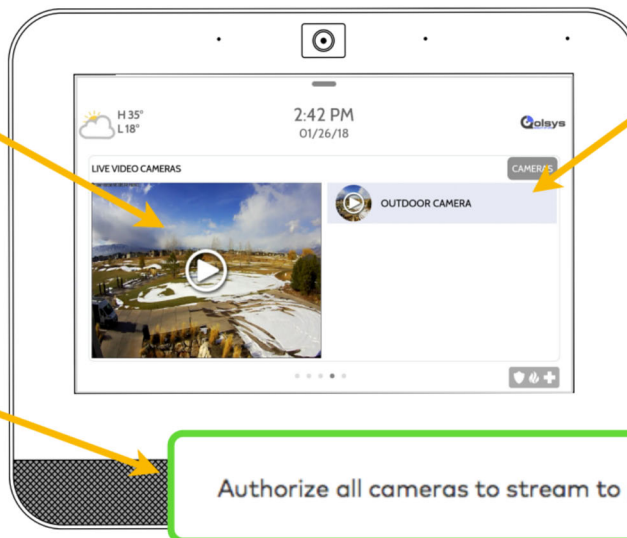
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A thumbnail of the camera will be displayed for the highlighted camera. Click the play button to view full screen.

#### Important Note

Cameras will only push to your panel if you have authorized them to do so from your Alarm.com customer website. This can be found under Video Settings.



#### Cameras List

All supported cameras that are on the account and have been authorized will show here. Click the camera you would like to view.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 16.

**Live View with Audio**

Listen in and speak to any room in the house using the Qolsys Live View with Audio feature. This can be done from your mobile app or right from the 7" touch screen. If your camera supports two-way audio, the talk button will automatically appear on the live view page.

**Talk**

Press and hold while talking to use the two-way audio feature built into your camera.

**End**

Press this button to exit.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 17

**Awareness Made Simple**

View live and recorded video in an instant with apps for tablets, phones and smart watches. View multiple cameras or locations on one app. Quickly and easily find saved clips. Get alerts and notifications with video clips attached.

See <https://www.dfwsecurity.com/home-security>

**Flexible Recording**

Smart Recording makes collecting and finding important footage easy and fast. You set exactly what you want to see, and your clips are stored securely in a searchable library in the cloud. Recording can be triggered by events, motion, schedule or on demand. Select an SVR for recording 24/7.

See <https://www.dfwsecurity.com/security-cameras/outdoor-indoor-cameras>.

65. On information and belief, DFW directly infringes at least claim 10 of the '898 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the DFW Products and Services.

66. Innovation Sciences has been damaged by Defendant's infringement and has caused / continues to cause it to suffer irreparable harm and damages as a result of the infringement.

**Count III – Infringement of United States Patent No. 11,109,094**

67. Innovation Sciences repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

68. On information and belief, DFW is violating 35 U.S. C. § 271(a) with respect to one or more claims of the '094 patent.

69. On information and belief, DFW (or those acting on its behalf) (i) make, use, sell, sell access to, import, offer to sell and/or offer to sell access to the DFW Products and Services in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 1 of the '094 patent.

70. On information and belief, one or more components of the DFW Products and Services provides a system (*e.g.*, DFW Smart Home Security System including video cameras, hub, alarm panel, sensors, etc.) comprising a central device (*e.g.*, security panel).

**The Ultimate Home Security Hub**

- 7" Touchscreen
- Encrypted Data Transmission
- Built-in Glass Break Detector
- Panel Camera for Disarm Photos
- Location-Based GEO Fencing
- Secure Wireless Monitoring - 5G & 6G Ready
- Arming Reminders and Alerts
- Bluetooth Touchless Disarming

**Smart Home Expandable**

Our Security Panel also acts as a hub for smart home technology like thermostats, lights, cameras, locks and garage doors. Home Automation components can be added and seamlessly controlled in the same app.

See <https://www.dfwsecurity.com/home-security/smart-security>

71. On information and belief, one or more components of the DFW Products and Services system's central device (*e.g.*, security panel) comprises an input interface configured for



communicating over a non-IP based wireless connection (e.g., Z-wave channel), wherein the non-IP based wireless connection comprises a short range wireless communication channel (e.g., Bluetooth).



### Z-Wave™ Test

A series of Z-Wave tests to optimize your smart home network. "Reconfigure network" is your most useful test, repairing your network for you.



### Dual Path Test

Run this test if your panel seems to have lost its ability to send and receive signals.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p.8, 11.

Wireless	WiFi	Wi-Fi 802.11 a/b/g/n/ac dual band 2.4/5ghz - including built-in router capability
	Image Sensor	Supports up to 5 Alarm.com Image Sensors (if included)
	Z-Wave	Supports up to 152 devices (80 lights, 15 Smart Sockets, 20 Locks, 10 Thermostats, 21 Misc, 6 Garage Doors)
	Cellular	LTE (Bands 2,4,5,12,13,17)
	Security R/F	Up to 128 RF Zones. IQ Panel 2 uses Encrypted 319.5MHz. IQ Panel 2+ uses PowerG plus ONE of the following depending on SKU: Encrypted 319.5MHz, 345MHz or 433MHz.
	Bluetooth	Qualcomm Bluetooth Low Energy (BLE) 4.0

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 177.



### Wi-Fi Test

Test the panel's connection to the wireless (Wi-Fi) network



### Sensor Test

Shows actual dBm signal strength of each sensor and graphs sensor events against the ambient noise floor of the environment



### Cellular Test

Test the panel's connection to the cellular network and Alarm.com



### Zi-Wave Tests

Test communication between devices and the panel.

Rediscover network, counters, neighbor info, diagnostics & advanced diagnostics



### PowerG Test

Ping and receive simple signal strength from a PowerG sensor.



### PowerG Signal Strength


Graphs and shows dBm signal strength for PowerG sensors.

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 120


Motion Detector	Glassbreak Detector	Door or Window Sensor
-Wireless Motion Detector	-Detects the Sound of Glass Breaking	-Wireless 2-Piece Contact
-Pet Immune up to 30 Pounds (single pet)	-Can cover Multiple Windows in a Single Room	-View Status on Mobile App
-Detects Motion on One Room (line of sight)		

See <https://www.dfwsecurity.com/products>.


## SENSOR STATUS



**Sensor Status**  
 Monitor sensor status in real time for things like open, close, tamper, idle and low battery.


 H 101°  
L 64°

12:29 PM  
Jul 23 2019




NO	PTID	ID	SIGNAL SOURCE	NAME	TYPE	GROUP	STATUS
1	1	12BEA1	G	Upstairs Motion Detector	Motion	17-Away-Instant Motion	Idle
2	1	12BEA2	G	Downstairs Motion Detector	Motion	17-Away-Instant Motion	Idle
3	1	12BEA3	G	Front Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
4	1	12BEA4	G	Laundry Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
5	1	12BEA5	G	Back Door	Door/Window	13-Instant	Open

This page also allows you to quickly review programming for things like Zone number, Partition, Signal Source (319, 345, 433, PowerG, Native or Zigbee), Sensor Name, Sensor Type and Sensor Group.

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 84.


72. On information and belief, one or more components of the DFW Products and Services system's central device (e.g., security panel) provides an output interface configured for providing a communication via a wireless communication network.


## CONNECTING TO WI-FI




To connect to a Wi-Fi network, follow the steps below:

Swipe down from the top menu bar and select settings.

 Touch Advanced Settings (Installer Code)


 Then touch "Wi-Fi"


 Enable Wi-Fi if not already active


Available networks appear in a list. Touch the desired network and use the keyboard to type the password (if required).


**Note:** Frequency, PMF and more can be changed under Advanced Settings


Activate WIFI


 Qolsys-5G  
Connected

 Now Communications

 Qolsys

 Sunset Room

 Vertical Ops 2.4

 Add wi-fi network

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 95



**Access Point Connected Devices**  
View connected device information such as IP, MAC address and for how long the device has been connected.

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 93

<b>Panel</b>	<b>MAC Address:</b>
--------------	---------------------

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 164

73. On information and belief, one or more components of the DFW Products and Services system's central device (*e.g.*, security panel) provides an interface/buffer; and a decoder (*e.g.*, panel receives compressed audio/video signals and displays the corresponding content, or the panel receives two-way voice).



#### **Wi-Fi Test**

Test the panel's connection to the wireless (Wi-Fi) network



#### **Sensor Test**

Shows actual dBm signal strength of each sensor and graphs sensor events against the ambient noise floor of the environment



#### **Cellular Test**

Test the panel's connection to the cellular network and Alarm.com



#### **Z-Wave Tests**

Test communication between devices and the panel. Rediscover network, counters, neighbor info, diagnostics & advanced diagnostics



#### **PowerG Test**

Ping and receive simple signal strength from a PowerG sensor.



#### **PowerG Signal Strength**

Graphs and shows dBm signal strength for PowerG sensors.

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 120.

### **Help in an Instant**

Two Way Communication, also known as 2-Way Voice, allows for faster communication in an emergency, because our monitoring agent can speak directly into your home through the loudspeaker on your keypad.

See <https://www.dfwsecurity.com/home-security/smart-security>

### Live View

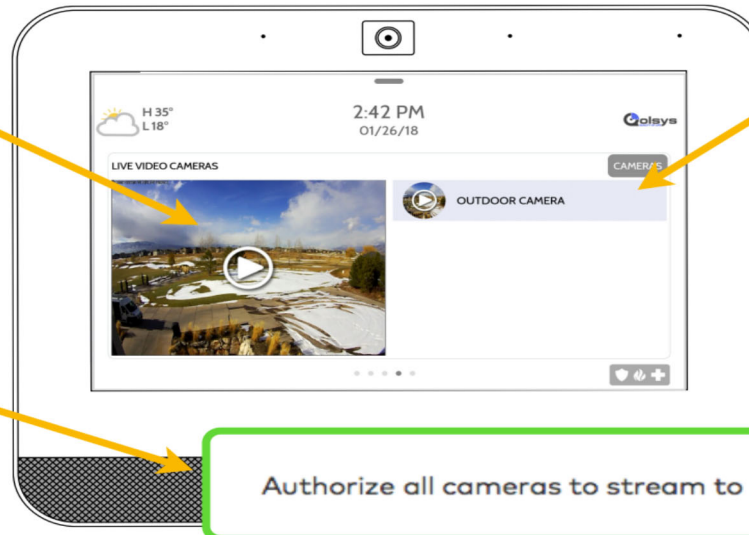
Easily view the live video feed from your Alarm.com video cameras on the 7" panel screen. This page will appear automatically if cameras are added to the account and the authorization has been given on the Alarm.com customer website. Supports live view of up to 40 cameras.

#### Camera View

A thumbnail of the camera will be displayed for the highlighted camera. Click the play button to view full screen.

#### Important Note

Cameras will only push to your panel if you have authorized them to do so from your Alarm.com customer website. This can be found under Video Settings.



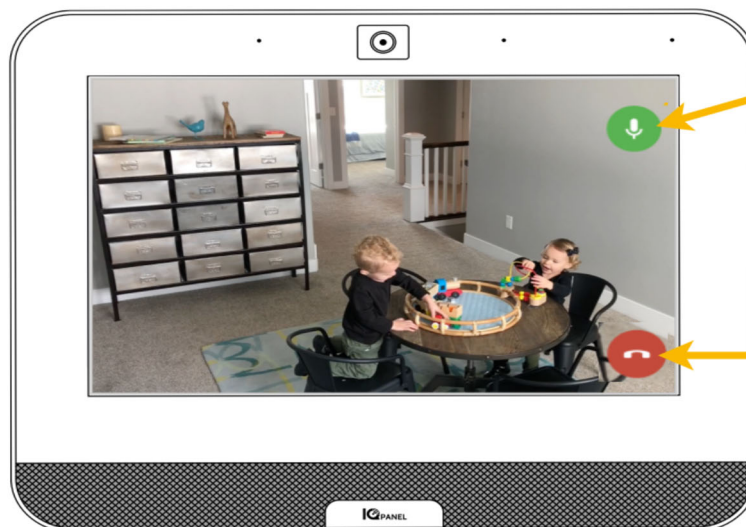
#### Cameras List

All supported cameras that are on the account and have been authorized will show here. Click the camera you would like to view.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 16.

### Live View with Audio

Listen in and speak to any room in the house using the Golsys Live View with Audio feature. This can be done from your mobile app or right from the 7" touch screen. If your camera supports two-way audio, the talk button will automatically appear on the live view page.



#### Talk

Press and hold while talking to use the two-way audio feature built into your camera.

#### End

Press this button to exit.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 17.

74. On information and belief, one or more components of the DFW Products and Services system's central device (e.g., security panel) provides that the input interface is configured to receive, from a sensing device transmitter (e.g., window sensor etc.), via the short range wireless



communication channel (e.g., Z-Wave or Bluetooth), a short range wireless communication indicating an updated status of an item (e.g., closed, open, armed, disarmed), the short range wireless communication comprising a signal.



### Z-Wave™ Test

A series of Z-Wave tests to optimize your smart home network. "Reconfigure network" is your most useful test, repairing your network for you.



### Dual Path Test

Run this test if your panel seems to have lost its ability to send and receive signals.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p.8, p.11)

Wireless	WiFi	Wi-Fi 802.11 a/b/g/n/ac dual band 2.4/5ghz - including built-in router capability
	Image Sensor	Supports up to 5 Alarm.com Image Sensors (if included)
	Z-Wave	Supports up to 152 devices (80 lights, 15 Smart Sockets, 20 Locks, 10 Thermostats, 21 Misc, 6 Garage Doors)
	Cellular	LTE (Bands 2,4,5,12,13,17)
	Security R/F	Up to 128 RF Zones. IQ Panel 2 uses Encrypted 319.5MHz. IQ Panel 2+ uses PowerG plus ONE of the following depending on SKU: Encrypted 319.5MHz, 345MHz or 433MHz.
	Bluetooth	Qualcomm Bluetooth Low Energy (BLE) 4.0

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 177.



### Wi-Fi Test

Test the panel's connection to the wireless (Wi-Fi) network



### Sensor Test

Shows actual dBm signal strength of each sensor and graphs sensor events against the ambient noise floor of the environment



### Cellular Test

Test the panel's connection to the cellular network and Alarm.com



### Z-Wave Tests

Test communication between devices and the panel. Rediscover network, counters, neighbor info, diagnostics & advanced diagnostics



### PowerG Test

Ping and receive simple signal strength from a PowerG sensor.



### PowerG Signal Strength


Graphs and shows dBm signal strength for PowerG sensors.

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 120.


Motion Detector	Glassbreak Detector	Door or Window Sensor
-Wireless Motion Detector	-Detects the Sound of Glass Breaking	-Wireless 2-Piece Contact
-Pet Immune up to 30 Pounds (single pet)	-Can cover Multiple Windows in a Single Room	-View Status on Mobile App
-Detects Motion on One Room (line of sight)		

See <https://www.dfwsecurity.com/products>

## SENSOR STATUS




**Sensor Status**  
Monitor sensor status in real time for things like open, close, tamper, idle and low battery.



H 101°  
L 64°

12:29 PM  
Jul 23 2019




NO	PTID	ID	SIGNAL SOURCE	NAME	TYPE	GROUP	STATUS
1	1	12BEA1	G	Upstairs Motion Detector	Motion	17-Away-Instant Motion	Idle
2	1	12BEA2	G	Downstairs Motion Detector	Motion	17-Away-Instant Motion	Idle
3	1	12BEA3	G	Front Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
4	1	12BEA4	G	Laundry Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
5	1	12BEA5	G	Back Door	Door/Window	13-Instant Motion/Door P.O.M	Open


This page also allows you to quickly review programming for things like Zone number, Partition, Signal Source (319, 345, 433, PowerG, Native or Zigbee), Sensor Name, Sensor Type and Sensor Group.

See <https://qolsys.com/wp-content/uploads/2021/04/IQ-Panel-Installation-Manual-2.6.0-FINAL-041921.pdf>, p. 84.

## SENSOR STATUS




**Sensor Status**  
Monitor sensor status in real time for things like open, close, tamper, idle and low battery.



H 101°  
L 64°

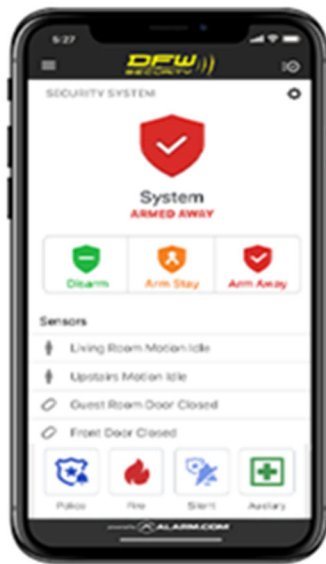
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Jul 23 2019



NO	PTID	ID	SIGNAL SOURCE	NAME	TYPE	GROUP	STATUS
1	1	12BEA1	G	Upstairs Motion Detector	Motion	17-Away-Instant Motion	Idle
2	1	12BEA2	G	Downstairs Motion Detector	Motion	17-Away-Instant Motion	Idle
3	1	12BEA3	G	Front Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
4	1	12BEA4	G	Laundry Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
5	1	12BEA5	G	Back Door	Door/Window	13-Instant Motion/Door P.O.M	Open

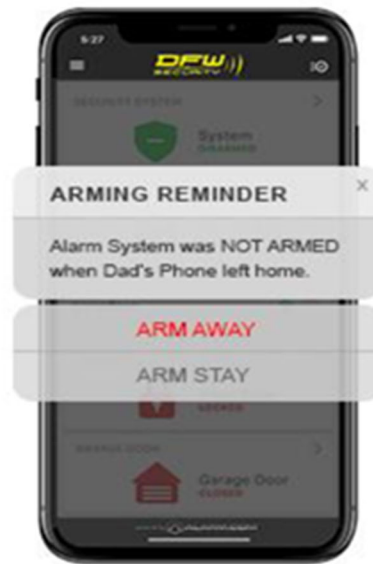
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## Simple Convenience

Our award-winning mobile app allows you to control your system from anywhere. Works with phones, tablets, Apple watch, Alexa and Google Home.



## Notifications and Alerts

Customized notifications so you'll know who's coming and going. Reminders so you'll never forget to arm your home security system again.

### Mobile Application

Manage your home's security with a powerful app that is straightforward and easy to use. Quickly check system and sensor status and view activity history. Arm or disarm with one click. We're constantly adding new features to make your life more simple and secure.

### We Keep You Informed

Text and email alerts from DFW Security ensure you are instantly notified about any type of alarm at your home or business, as well as other activity you want to know about.


See <https://www.dfwsecurity.com/home-security/smart-security>.

75. On information and belief, one or more components of the DFW Products and Services system's central device (e.g., security panel) provides that the central device is configured to transmit,




via the output interface, a notification regarding the updated status based on the signal (e.g. a customized notification is communicated via the WiFi network).

## SENSOR STATUS




**Sensor Status**  
Monitor sensor status in real time for things like open, close, tamper, idle and low battery.



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L 64°

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Jul 23 2019

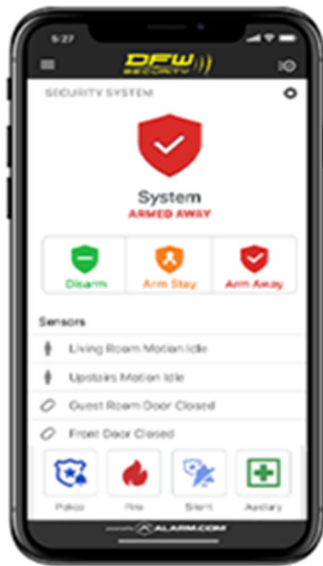


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4	1	12BEA4	G	Laundry Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
5	1	12BEA5	G	Back Door	Door/Window	13-Instant	Open

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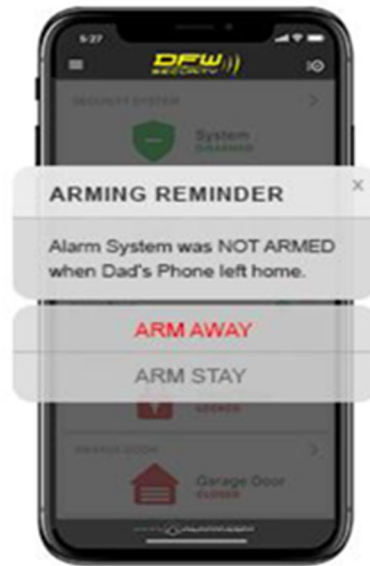
### Mobile Application

Manage your home's security with a powerful app that is straightforward and easy to use. **Quickly check system and sensor status and view activity history.** Arm or disarm with one click. We're constantly adding new features to make your life more simple and secure.

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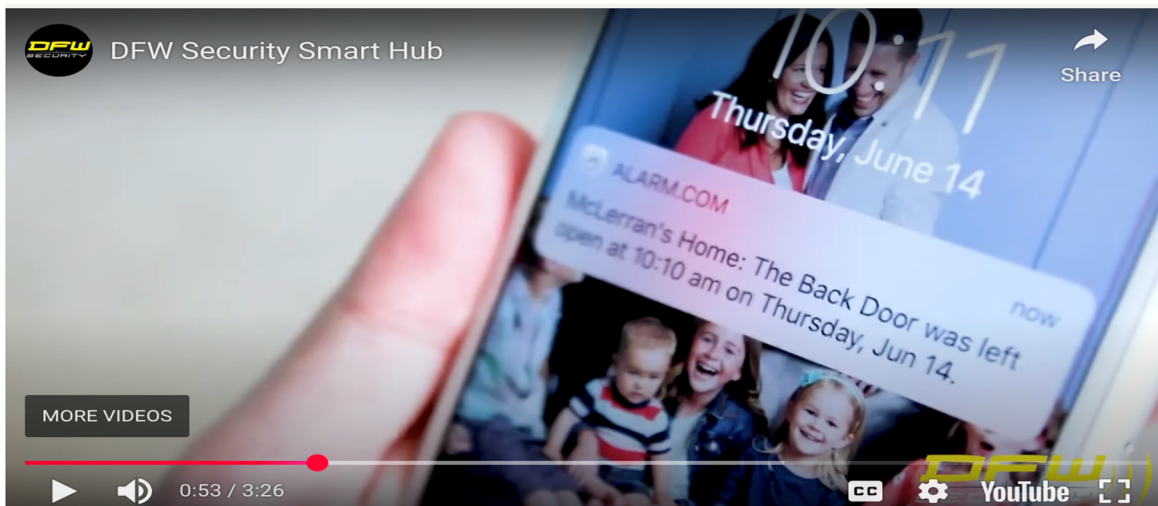
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See <https://www.dfwsecurity.com/home-security/smart-security>



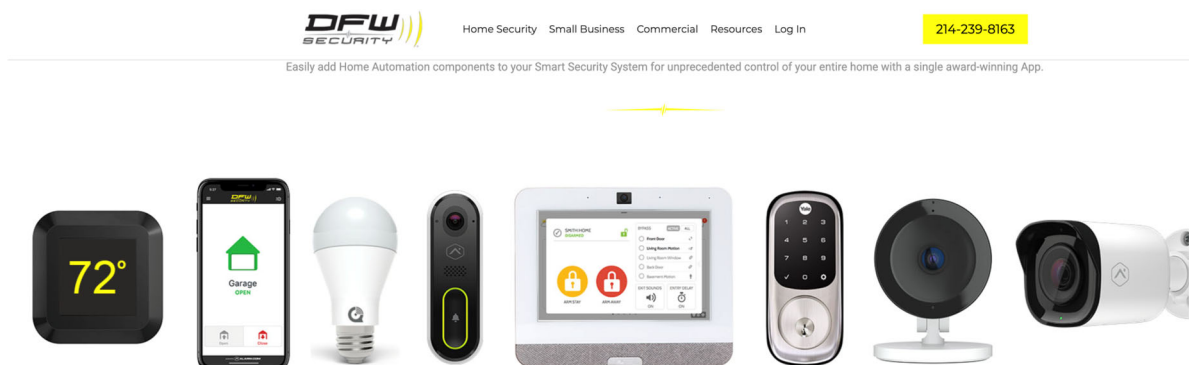
## Notifications and Alerts

Customized notifications so you'll know who's coming and going. Reminders so you'll never forget to arm your home security system again.

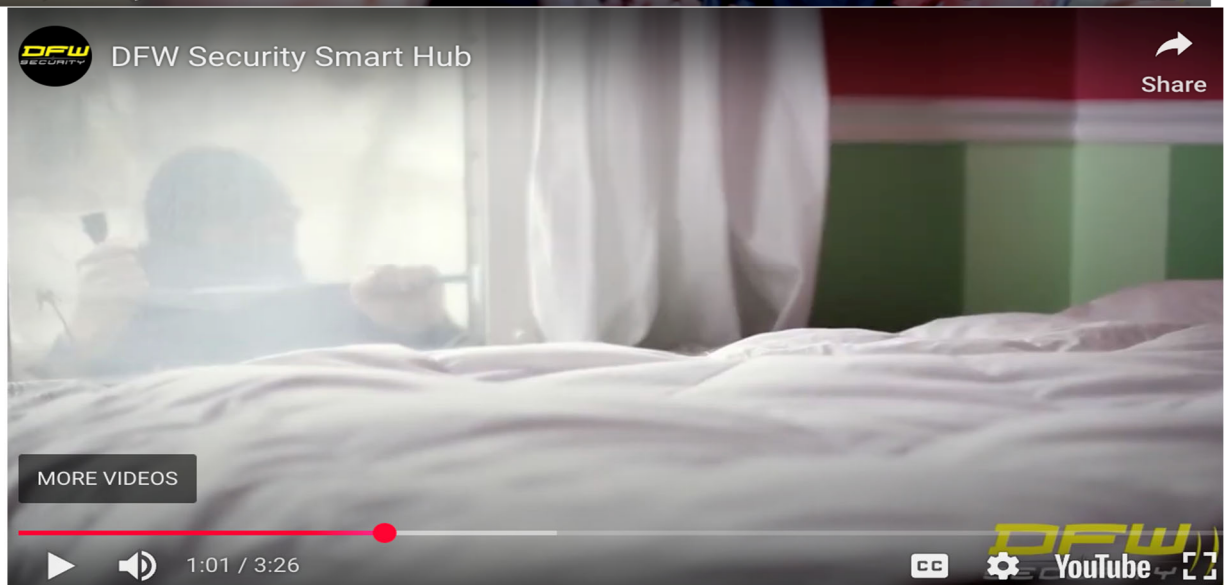
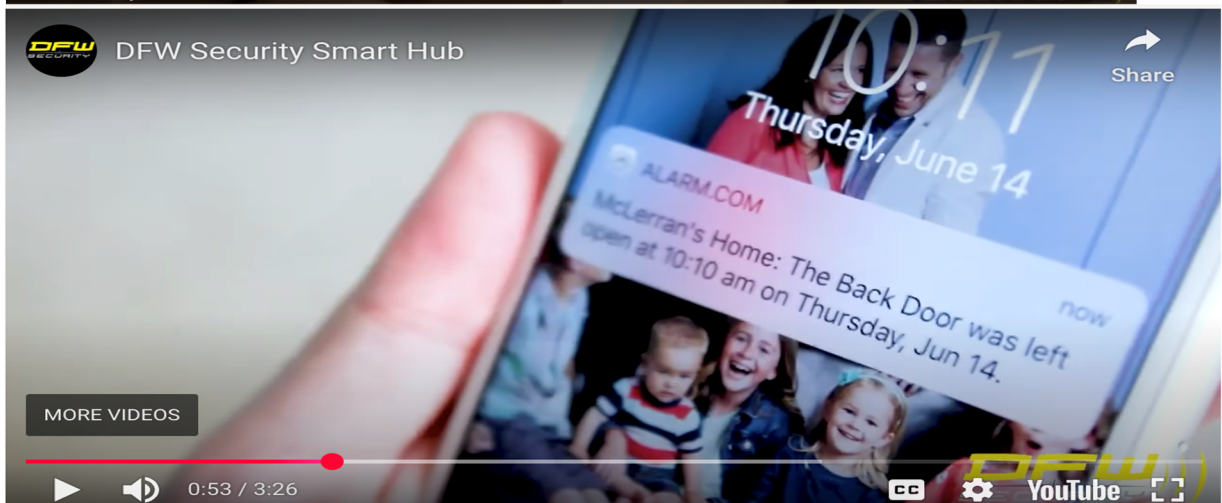


See <https://www.dfwsecurity.com/home-security/smart-security>

76. On information and belief, one or more components of the DFW Products and Services system's central device (e.g., security panel) provides that the non-IP based wireless connection (e.g., Z-wave) is initiated by the updated status detected by a sensing device sensor (e.g., an intrusion, etc.); wherein identification information corresponding to a sensing device is communicated via the short range wireless communication (e.g., a door, a window, etc.).




See <https://www.dfwsecurity.com/home-security/smart-security>




See <https://www.dfwsecurity.com/home-security/smart-security>




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4	1	12BEA4	G	Laundry Door	Door/Window	10-Entry-Exit-Normal Delay	Closed
5	1	12BEA5	G	Back Door	Door/Window	13-Instant	Open

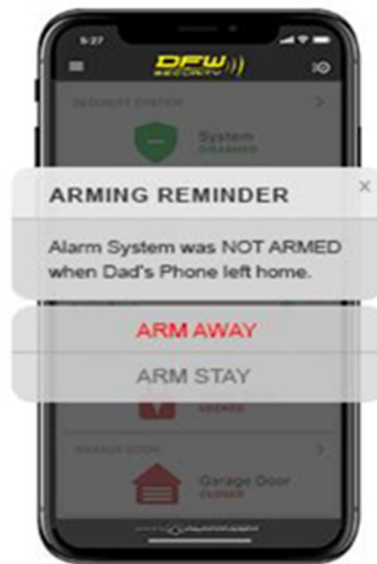
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### Mobile Application

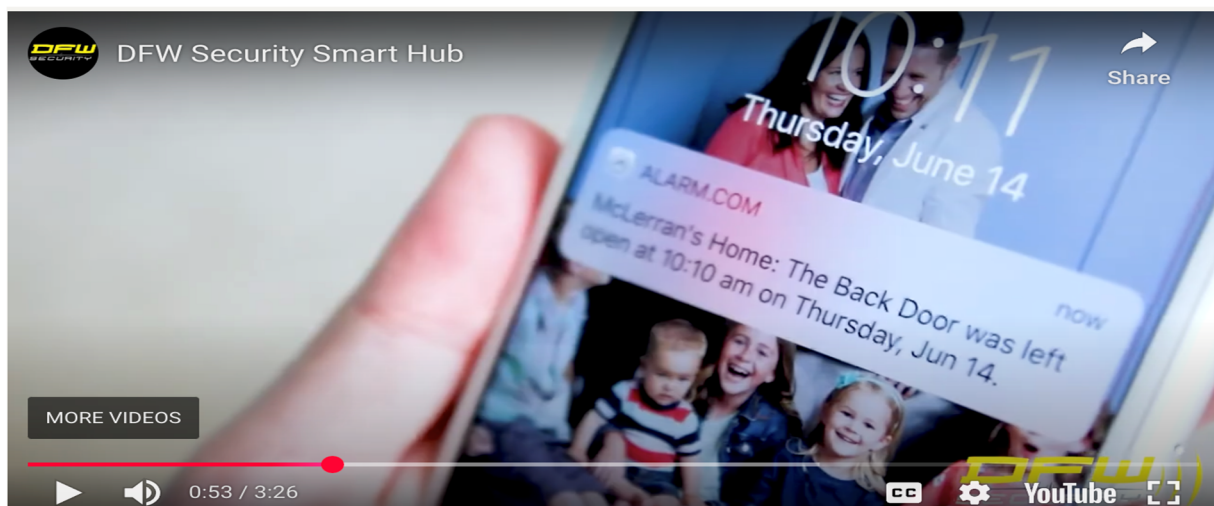
Manage your home's security with a powerful app that is straightforward and easy to use. Quickly check system and sensor status and view activity history. Arm or disarm with one click. We're constantly adding new features to make your life more simple and secure.

### We Keep You Informed

Text and email alerts from DFW Security ensure you are instantly notified about any type of alarm at your home or business, as well as other activity you want to know about.

See <https://www.dfwsecurity.com/home-security/smart-security>)

77. On information and belief, one or more components of the DFW Products and Services system's central device (*e.g.*, security panel) provides that at least one of a sound, a light, or a text that communicates information regarding the updated status is triggered by the short range wireless communication.



See <https://www.dfwsecurity.com/home-security/smart-security>

### We Keep You Informed

Text and email alerts from DFW Security ensure you are instantly notified about any type of alarm at your home or business, as well as other activity you want to know about.

See <https://www.dfwsecurity.com/home-security/smart-security>



### **Alarm.com Scenes**

If enabled by your dealer, Alarm.com Scenes allow you to control multiple devices with the click of a single button right from your touchscreen. Each option is a multi-device command that coordinates different smart devices to accomplish a complex task. Smart Scenes must be setup and customized from your Alarm.com customer portal before they can be used from the panel.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p.20.

### **PARTITIONS**

The IQ4 Hub allows for up to 4 partitions to be programmed. Partitions allows for the creation of zone groups in a home or building so that users can arm some sections of the property while leaving other areas disarmed. Partitioning enables greater personalization and functionality while simplifying installation. Each partition controls its local zone status, alerts and notifications. Any area or zone the needs to be armed or disarmed separately from the rest of the structure can be turned into a partition.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p.21.

78. On information and belief, one or more components of the DFW Products and Services system's central device (e.g., security panel) provides that the output interface is configured to transmit the notification, to a cellular phone, via the wireless communication network.

### **We Keep You Informed**

Text and email alerts from DFW Security ensure you are instantly notified about any type of alarm at your home or business, as well as other activity you want to know about.

See <https://www.dfwsecurity.com/home-security/smart-security>.

### **Alarm.com Scenes**

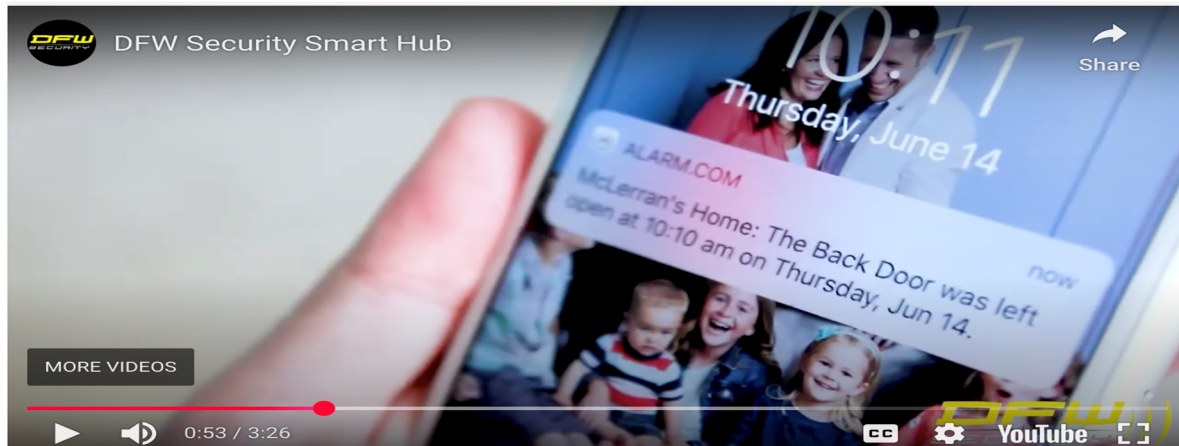
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## PARTITIONS

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See <https://www.dfwsecurity.com/home-security/smart-security>

79. On information and belief, one or more components of the DFW Products and Services system's central device (*e.g.*, security panel) provides wherein the interface/buffer is configured to receive a compressed digital signal that comprises at least one of audio and video data, through a cellular communications network or a wireless local area network.

	<b>Wi-Fi Test</b> Test the panel's connection to the wireless (Wi-Fi) network		<b>Z-Wave Tests</b> Test communication between devices and the panel. Rediscover network, counters, neighbor info, diagnostics & advanced diagnostics
	<b>Sensor Test</b> Shows actual dBm signal strength of each sensor and graphs sensor events against the ambient noise floor of the environment		<b>PowerG Test</b> Ping and receive simple signal strength from a PowerG sensor.
	<b>Cellular Test</b> Test the panel's connection to the cellular network and Alarm.com		<b>PowerG Signal Strength</b> Graphs and shows dBm signal strength for PowerG sensors.

See <https://qolsys.com/wp-content/uploads/2023/04/IQ-Panel-4-Installation-Manual-4.3.0-230221-FINAL.pdf>, p. 120.

## Help in an Instant

Two Way Communication, also known as 2-Way Voice, allows for faster communication in an emergency, because our monitoring agent can speak directly into your home through the loudspeaker on your keypad.

See <https://www.dfwsecurity.com/home-security/smart-security>.

### Live View

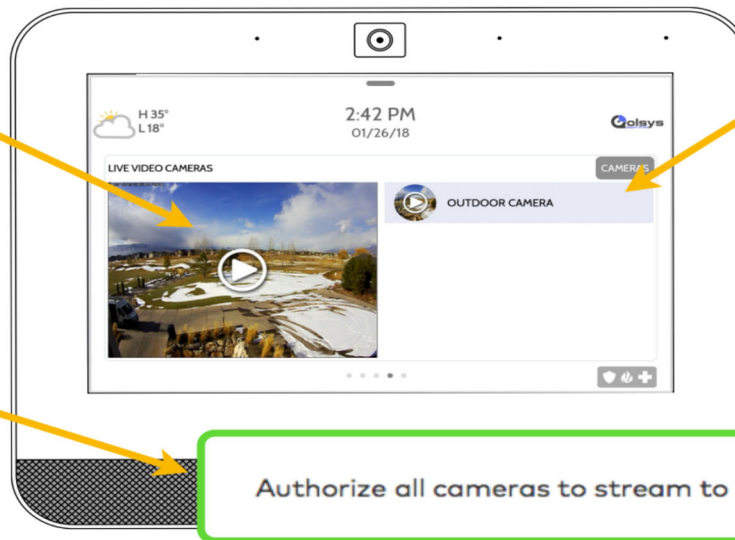
Easily view the live video feed from your Alarm.com video cameras on the 7" panel screen. This page will appear automatically if cameras are added to the account and the authorization has been given on the Alarm.com customer website. Supports live view of up to 40 cameras.

#### Camera View

A thumbnail of the camera will be displayed for the highlighted camera. Click the play button to view full screen.

#### Important Note

Cameras will only push to your panel if you have authorized them to do so from your Alarm.com customer website. This can be found under Video Settings.



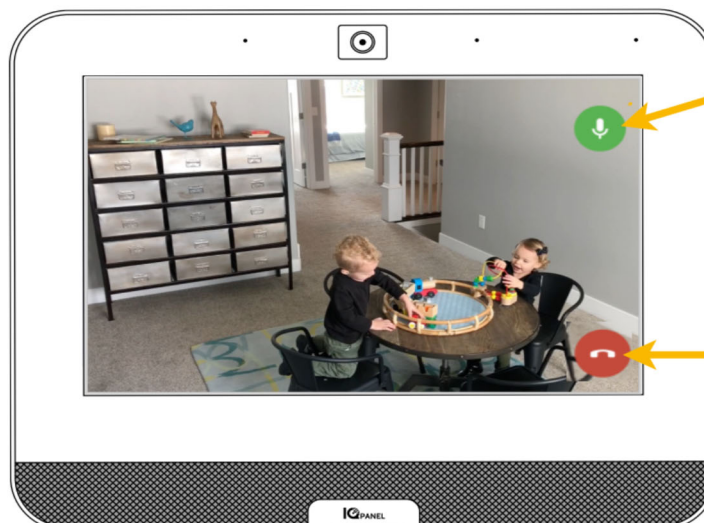
#### Cameras List

All supported cameras that are on the account and have been authorized will show here. Click the camera you would like to view.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 16.

### Live View with Audio

Listen in and speak to any room in the house using the Qolsys Live View with Audio feature. This can be done from your mobile app or right from the 7" touch screen. If your camera supports two-way audio, the talk button will automatically appear on the live view page.



#### Talk

Press and hold while talking to use the two-way audio feature built into your camera.

#### End

Press this button to exit.



See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 17.



See <https://qolsys.com/residential/>

80. On information and belief, one or more components of the DFW Products and Services system's central device (*e.g.*, security panel) provides wherein the decoder is configured to receive the compressed digital signal from the interface/buffer and decompress the compressed digital signal to a decompressed digital signal for information production (*e.g.* audio and video signals are compressed and then decompressed for production, or two-way voice signals).

#### Help in an Instant

Two Way Communication, also known as 2-Way Voice, allows for faster communication in an emergency, because our monitoring agent can speak directly into your home through the loudspeaker on your keypad.

See <https://www.dfwsecurity.com/home-security/smart-security>

### Live View

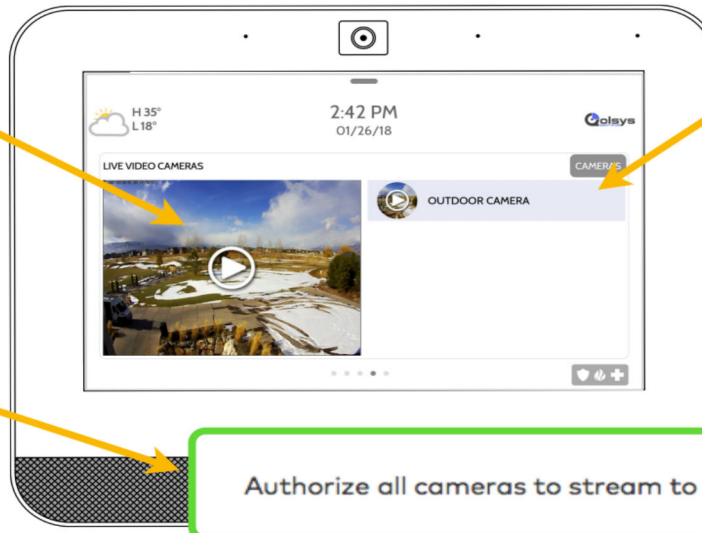
Easily view the live video feed from your Alarm.com video cameras on the 7" panel screen. This page will appear automatically if cameras are added to the account and the authorization has been given on the Alarm.com customer website. Supports live view of up to 40 cameras.

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#### Important Note

Cameras will only push to your panel if you have authorized them to do so from your Alarm.com customer website. This can be found under Video Settings.



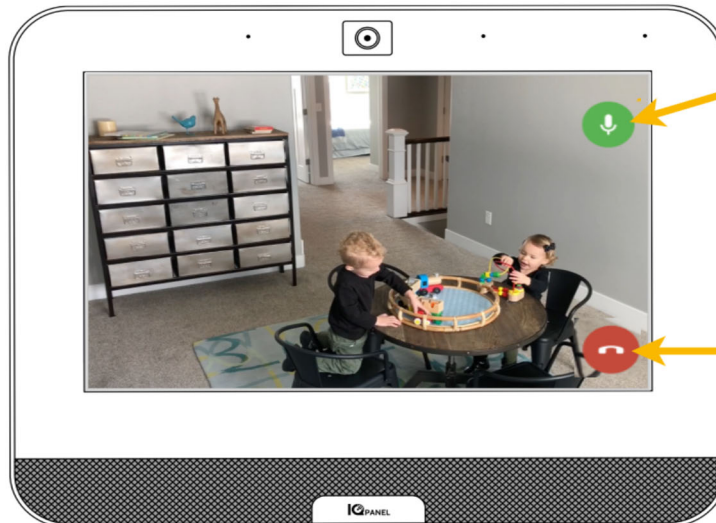
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See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 16

### Live View with Audio

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#### Talk

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#### End

Press this button to exit.

See <https://www.dfwsecurity.com/sites/default/files/iq4-hub-user-guide.pdf>, p. 17.

### Awareness Made Simple

View live and recorded video in an instant with apps for tablets, phones and smart watches. View multiple cameras or locations on one app. Quickly and easily find saved clips. Get alerts and notifications with video clips attached.



See <https://www.dfwsecurity.com/home-security>

### **Flexible Recording**

Smart Recording makes collecting and finding important footage easy and fast. You set exactly what you want to see, and your clips are stored securely in a searchable library in the cloud. Recording can be triggered by events, motion, schedule or on demand. Select an SVR for recording 24/7.

See <https://www.dfwsecurity.com/security-cameras/outdoor-indoor-cameras>.

81. On information and belief, DFW directly infringes at least claim 1 of the '094 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the DFW Products and Services.

82. Innovation Sciences has been damaged by Defendant's infringement and has caused / continues to cause it to suffer irreparable harm and damages as a result of the infringement.

### **JURY DEMANDED**

83. Pursuant to Federal Rule of Civil Procedure 38(b), Innovation Sciences hereby requests a trial by jury on all issues so triable.

### **PRAYER FOR RELIEF**

Innovation Sciences respectfully requests this Court to enter judgment in its favor and against Defendant as follows:

- a. finding that DFW has infringed one or more claims of the '425 patent under 35 U.S.C. §§ 271(a);
- b. finding that DFW has infringed one or more claims of the '898 patent under 35 U.S.C. §§ 271(a);
- c. finding that DFW has infringed one or more claims of the '094 patent under 35 U.S.C. §§ 271(a);

- d. awarding Innovation Sciences damages under 35 U.S.C. § 284, or otherwise permitted by law, including supplemental damages for any continued post-verdict infringement;
- e. awarding Innovation Sciences pre-judgment and post-judgment interest on the damages award and costs;
- f. awarding cost of this action (including all disbursements) and attorney fees pursuant to 35 U.S.C. § 285, or as otherwise permitted by the law; and,
- g. awarding such other costs and further relief that the Court determines to be just and equitable.

Dated: June 2, 2025

Respectfully submitted,

/s/Raymond W. Mort, III  
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